



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 15, 2015

Michael Y.M. Loo
Secretary and Manager Princeville Utilities Company, Inc
5-3541 Kuhio Hawaii, Suite 221
Princeville, Hawaii 96722

Re: Polychlorinated Biphenyls (PCBs) – Conditional Approval of *Technical Memorandum, Princeville Remedial Action Plan Response to Comments*, from George Sauer (AECOMM) and Mark Hofferbert (AECOM) to Joanna Seto (Hawaii DOH) and Jeff Scott (USEPA), dated November 27, 2013, as modified by January 14, 2014 e-mail from George Sauer to John Beach, subject: *Princeville Sampling*.

Dear Mr. Loo:

The U.S. Environmental Protection Agency (USEPA) accepts the subject documents as a request to amend USEPA's June 14, 2013 conditional approval of Priceville Utilities Company, Inc.'s (PUCI) Application for risk-based disposal approval for cleanup of polychlorinated biphenyl (PCB) contamination under the Toxic Substances Control Act (TSCA) regulations in 40 CFR§761.61(c) (Original Approval). On November 1, 2013, USEPA approved Amendment 1 to the Original Approval. With this letter, USEPA approves the subject documents as Amendment 2 to our Original Approval, as amended by Amendment 1, subject to the conditions presented herein. Please proceed with implementation of the *Princeville Remedial Action Plan* dated September 2013, as amended by Amendment 1 and this Amendment, subject to the conditions listed below.

USEPA's Approval of Amendment 1 included ten (10) specific Conditions of Approval; the subject documents adequately address all of those Conditions of Approval, except those addressed herein. USEPA's Original Approval and Amendment also identified several conditions not addressed that remain as outstanding requirements.

Conditions of Approval

1. The Amendment 1 includes provisions for establishing or modifying specifications and procedures as the result of field inspection following the draining of the tank and the inspection of its interior, such as the number or location of characterization and confirmation samples to be collected from within the tank, the identification of bulk product (if present) needing removal and the refinement of cleaning methods. PUCI must continue to coordinate with USEPA and Hawaii Department of Health (HDOH) to obtain approvals for such modifications.

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2. The subject e-mail supercedes the sampling and analysis method previously proposed for confirmation sampling of concrete inside the tank.
3. The subject e-mail also supersedes the previously proposed risk-based cleanup level (RBCL) proposed for evaluating confirmation samples of concrete from the interior walls of Reservoir 1 tank. EPA will use as that RBCL the Maximum Contaminant Limit (MCL) of 0.5 micrograms per liter (ug/l) in the extract water from confirmation samples produced using Method 1312.
4. Extraction of confirmation samples composed of concrete from the interior walls of the Reservoir 1 tank must be use water from the Princeville water supply without adjustment of the pH as specified in Method 1312, Synthetic Precipitation Leaching Procedure.


Any changes to the terms and conditions of this approval must be approved by USEPA prior to implementation.

USEPA expects the approved actions to meet the requirements for PCB Cleanup under 40 CFR§761.61(c), subject to confirmation in the cleanup verification report. However, if at some later date, new information shows that PCBs at or from the Reservoir 1 tank may present an unreasonable risk of injury to health or the environment, USEPA may require additional characterization and/or cleanup of such PCBs.

This approval applies only to the PCBs present at the Site and does not address cleanup of other contaminants at the Site. This conditional approval does not change the PUCI's responsibility to perform characterization or cleanup activities or any other obligations under any other statute.

We look forward to assisting PUCI during implementation of this PCB cleanup approval. Please contact John Beach of my staff at 415-972-3347 if you have any questions concerning this conditional approval.

Sincerely,


Jeff Scott
Director
Waste Management Division

Attachment: January 14, 2014 e-mail from George Sauer to John Beach, subject: *Princeville Sampling*

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cc: Joanna Seto, Hawaii Department of Health, Safe Drinking Water Branch
Elizabeth Galvez, Hawaii Department of Health, Hazard Evaluation and Emergency
Response Branch
John Beach, USEPA Region 9
